

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

**FILED**

APR 09 2025

JENNIFER RYAN,

CLERK, U.S. DISTRICT COURT  
TEXAS EASTERN

Plaintiff,

CIVIL ACTION NO.: 4:22-cv-559

v.

JURY TRIAL DEMANDED

PAYPAL INC.,

Defendant.

**Plaintiff's Notice to Preserve Record for Potential Appeal Regarding Stay**

Plaintiff Jennifer Ryan, pro se, respectfully notifies the Court that, in light of pending motions to lift the stay (Dkts. 44, 47), she seeks to preserve for appeal all filed motions (Dkts. 44, 47, 48, 50, 52, 53, 54, 55, 57, 58, 59, 60, 68) and the Second Amended Complaint (Dkt. 49), including all exhibits (e.g., Dkt. 49, Exhibits A, C, G, O; Dkt. 57, Exhibits A-S). These address waiver, state action, and constitutional claims critical to arbitrability.

Plaintiff further notes ongoing settlement discussions with the U.S. Department of Justice (DOJ) in Ryan v. DOJ & Rochlin, Case No. 3:25-CV-00325-X-BT, regarding DOJ misconduct linked to her January 6 prosecution, which supports her state action claims (Dkt. 49, ¶¶ 13-28, Exhibits G, S) relevant to the stay.

Plaintiff defers to the Court's ruling per Dkt. 69 and submits this solely to ensure record clarity, not to request action.

April 9, 2025

Respectfully Submitted,

  
Jennifer L. Ryan, Pro Se  
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CERTIFICATE OF SERVICE

I certify that on April 9, 2025, I hand-delivered this Notice to Preserve Record for Potential Appeal Regarding Stay to the United States Courthouse, 7940 Preston Rd, Plano, TX 75024, for filing in Case No. 4:22-cv-559, and served it via CM/ECF to all counsel of record per Fed. R. Civ. P. 5 and Local Rule CV-5.

/s/ Jennifer L. Ryan